

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	Case Number 4:18CR87
	§	
LAURA JORDAN (1)	§	
a/k/a Laura Maczka	§	
MARK JORDAN (2)	§	

**DEFENDANT'S AMENDED JOINT NOTICE OF INTENT TO OFFER CERTIFIED
DOMESTIC RECORDS OF REGULARLY CONDUCTED ACTIVITY**

Pursuant to Federal Rules of Evidence 902(11) and 803(6), Defendants Mark Jordan and Laura Jordan hereby provide formal notice of intent to offer the following records, certified pursuant to Federal Rules of Evidence 902(11) and 803(6), as evidence at the trial of this case.

Defendants' Joint Exhibit #	Description of Exhibit	Date Offered	Marked	Admitted
1	Project Update Memorandum from Rodman Jordan to Mark Jordan 4/17/12			
2	Letter from Rodman Jordan to David Moore 6/12/12 re Palisades III zoning and entitlement budget			
3	Centura Development Co., LLC Invoice 8/28/12			
4	Email from Hank Mulvihill to Laura Maczka and Rodman Jordan September 2012 re neighborhood meeting			
5	GFF Response to Palisades Rezoning report 9/9/13			
6	Rodman Jordan Palisades Village Development Entity Proposal 9/15/12			
7	Palisades Village Meeting Agenda 9/17/12			

Defendants' Joint Exhibit #	Description of Exhibit	Date Offered	Marked	Admitted
8	Rodman Jordan Palisades Village Development Entity Proposal 9/20/12			
10	Palisades Village Predevelopment Phasing Draft 10/8/12			
11	Business Cards			
12	Samoo Palisades Phasing Maps			
13	Mark Jordan calendar entry 10/16/12 re Phase II Annex			
14	Mark Jordan calendar entry 10/30/12 re Charrette Meeting			
15	Mark Jordan calendar entry 11/3/12 re Phase II Planning			
17	Email from Mark Jordan to Rodman Jordan 11/28/12 re Delay in Entitlement Processing			
18	Letter from Rodman Jordan to Larry Good 12/5/12 re Samoo			
19	Letter from Rodman Jordan to Mark Jordan 1/2/13 re Notice of Delay			
20	Email from Woochun Rah to Mark Jordan and Rodman Jordan 1/9/13 re Samsung Meeting			
21	Palisades presentation to Canyon Creek Homeowners Association 10/23/13			
23	GFF Palisades Planned Development Code Draft 10/25/13			
25	GFF Palisades Master Plan Map 4/30/14			
25A	GFF Palisades Master Plan Map 4/30/14 Enlarged and Mounted			
26	Palisades Central Information Pamphlet			
27	Palisades Central Development Photo			
28	Palisades Central Development Photo 4/2/14			

Defendants' Joint Exhibit #	Description of Exhibit	Date Offered	Marked	Admitted
29	GFF Palisades Parcel Plan 6/18/14			
30	GFF Palisades Proposed Phasing Plan and Regulating Plan			
32	JP Partners Articles of Incorporation			
33	Google Earth Photo - Palisades - County Line shown			
34	Photo Palisades Land with Phasing Included			
35	Aerial photograph of Palisades site, US 75, and Galatyn Rail Station			
43	Development and Economic Development Agreement Palisades			
45	City of Richardson Map			
45A	City of Richardson Map Enlarged and Mounted			
47	Email from Mark Jordan and Steve Mitchell re lunch at Del Frisco Grill			
50	Urban Land Institute Advisory Services Panel Report for Richardson, Texas 2001			
52	City of Richardson 2009 Comprehensive Plan			
58	Richardson City Council Minutes, January 31, 2011.			
58A	City Council Meeting Video January 31, 2011.			
59	Richardson City Council Minutes, February 14, 2011			
60	Richardson City Council Minutes, May 12, 2014			
62	Richardson City Council Minutes, September 24, 2012			
62A	City Council Meeting Video, September 24, 2012			

Defendants' Joint Exhibit #	Description of Exhibit	Date Offered	Marked	Admitted
63	Richardson City Council Minutes, October 22, 2012			
63A	City Council Meeting Video, October 22, 2012			
64	Richardson City Council Minutes, November 12, 2012.			
64A	City Council Meeting Video, November 12, 2012.			
65	Richardson City Council Minutes, January 28, 2013.			
65A	City Council Meeting Video, January 28, 2013.			
66	City of Richardson report: Samsung Campus Considerations 1/15/14			
67	City of Richardson Staff Report to City Council 12/5/13 re Palisades PD Code			
68	City of Richardson Staff Report to City Council 6/5/14 re Palisades PD Code			
70	CityLine-Bush Profile Brochure			
71	City of Richardson City Council Minutes, May 22, 2017			
72	City Council Meeting Minutes, January 17, 2011			
72A	City Council Meeting Video, January 17, 2011			
73	Palisades Zoning Packet 12/9/2013			
73A	Palisades Zoning Notice 13-13 dated 6/17/2013			
73B	GFF Letter to Michael Spicer re Applicant's Statement of Intent 6/27/2013			
73C	City Council Memo re Palisades PD Code 12/5/2013			
73D	CPC Meeting Minutes Zoning file 13-13 excerpt 11/5/2013			

Defendants' Joint Exhibit #	Description of Exhibit	Date Offered	Marked	Admitted
73E	CPC Meeting Minutes Zoning file 13-13 excerpt 11/19/2013			
73F	Palisades Planned Development Code 1/27/2014			
73G	Illustrative Master Plan			
73H	Presentation to City Council 6/9/2013			
74	Palisades Zoning Packet 6/9/2014			
74A	Palisades Zoning Notice 13-14 dated 4/17/2014			
74B	Final Palisades Planned Development Code 6/9/2014			
74C	Comparison Excerpt - Entitled vs Proposed			
74D	CPC Meeting Minutes Zoning file 14-13 excerpt 5/20/2014			
74E	CPC Meeting Minutes Zoning file 14-13 excerpt 6/3/2014			
74F	GFF Letter to Michael Spicer re Applicant's Statement of Intent 4/7/2014			
74G	Palisades Development Simulation Video			
74H	City Council Memo re Palisades PD Code 6/5/2014			
81	August 25, 2014 JP Realty Partners letter written to Dan Johnson regarding a Request for Development Incentives and signed by Mark Jordan			
95	2017-07-13 - Letter from Mark to Mueller re Attorney/Client Privilege			
145	Mark Jordan AT&T Phone Records			
150	Text messages between Karen Jordan and SA Andy Walton			
171	City Council Meeting Minutes, May 18, 2015			

Defendants' Joint Exhibit #	Description of Exhibit	Date Offered	Marked	Admitted
172	Election results for Richardson City Council for 2011			
173	Election results for Richardson City Council for 2015			
174	Election Results for Richardson City Council for 2013			
175	Richardson Chamber of Commerce City Council Forum Candidate Responses 04/09/2011			
176	Dallas Morning News Voter Guide: Richardson Mayor Candidate Q&A 2013			
179	Laura Maczka for Richardson Mayor Email Archive 2013			
180	Amir Omar Campaign Mailer 2013			
181	Laura Maczka Campaign Mailer 2013			
182	Amir Omar for Mayor Door Hanger 2013			
183	Richardson Coalition Mayoral Election 2013 Voter's Guide			
186	Campaign Finance Report – MJ Contribution to Amir			
187	Campaign Finance Report – MJ Contribution to Laura			
190	Guest List for the Mayor's Christmas Party for 2011			
191	Guest List for the Mayor's Christmas Party for 2012			
192	Guest List for the Mayor's Christmas Party for 2013			
193	Guest List for the Mayor's Christmas Party for 2014			
200	American Express Business Bills for Sarah Catherine Norris Account ending 6-82000			

Defendants' Joint Exhibit #	Description of Exhibit	Date Offered	Marked	Admitted
200A	American Express Bills for Sarah Catherine Norris Account ending 6-82000			
200B	Steve Scheets Summary Chart			
200C	Steve Scheets Summary Chart			
200D	Steve Scheets Summary Chart			
201	JP Realty Partners Frost Bank Acct ending in 1220 Statements and Payment Reports			
202	JP Realty Partners report July 2014			
203	JP Realty Partners report Sept 2014			
204	Sooner Management LLC Payroll Records 2012-2014			
205	Sooner Management Citibank check register payments report			
206	Sooner Management LLC CitiBusiness Credit Card ending in 4824 Statements and Related Records			
207	Sooner Management CitiBusiness Card check register payments report			
208	Sooner Management Monthly Reports 2012-2014			
209	Sooner Management LLC Frost Bank Acct ending in 9307 Statements			
210	Sooner National Property Mgmt LP Frost Bank Acct ending in 1069 Statements and Related Records			
211	Sooner National Property Management CitiBusiness card ending in 9377 Statements and Related Records			
211 A	Sooner National Property Management CitiBusiness card ending in 9377 Statements			

Defendants' Joint Exhibit #	Description of Exhibit	Date Offered	Marked	Admitted
220	J&P Realty Inc. CitiBusiness Card ending in 2518 Statements and Related Records			
220A	J&P Realty Inc. CitiBusiness Card ending in 2518 Statements			
221	Mark Jordan American Express Card ending in 85008 Statements and Related Records			
222	Mark D Jordan or Karen Jordan Frost Bank Acct ending in 2676 Statements			
223	Mark Jordan Wells Fargo PMA account ending 2912 Statements			
224	Mark Jordan Wells Fargo PMA account ending 2912 – July 31, 2014 Statement			
225	Mark Jordan Wells Fargo PMA account ending 2912 – August 31, 2014 Statement			
230	Sarah Catherine Norris YARDI Entries 2012-2014			
231	Sarah Catherine Norris YARDI correspondence 2010-2014			
232	Sooner National Property Management L.P. September 2014 Financial Reports			
233	Sooner Management LLC Payroll Records.			
234A	Frost Bank Statements for Account Ending in 1069			
234B	Frost Bank Statements for Account Ending in 9307			
235	Sooner Management LLC K-1s for Sarah Catherine Norris from 2008-2014			
237	BBVA compass Records of Karen Jordan showing \$55,000 check deposit			
241	Laura G Maczka USAA card ending in 5117 Statements			
242	Marriott Rewards card ending in 7991 Statements			

Defendants' Joint Exhibit #	Description of Exhibit	Date Offered	Marked	Admitted
243	Mike J Maczka Chase Southwest Airlines Card ending in 3592 Statements			
244	Michael J Maczka US Bank card ending in 1733 Statements			
245	Mike J Maczka Chase Marriott Rewards card ending in 6158 Statements			
246	Mike J Maczka Jr Chase Freedom card ending in 3855 Statements			
247	Mike J Maczka Bank of America card ending in 9337 Statements and Application			
248	Mike Maczka Citibank card ending in 5617 Statements			
249	Michael J Maczka USAA checking account ending in 9421-0 Statements and Related Records			
253	Laura G Maczka Wells Fargo PMA account ending in 4928 Statements			
256	Laura G. Maczka Discover account ending in 9420 Statements			
257	Laura G. Maczka Chase account ending in 3670 Statements			
260	Sooner management chart reflecting salary by employee			
261	Photo of SA Andy Walton with Doug Ligon Band			
264	Gary Kroll Summary Chart of Known Sooner Management Distributions			
265	Sooner Management LLC K-1s for Mark Jordan 2008-2014			
268	Sooner National Property Management Employee Guide-PTO Policy			
269	Sooner National YARDI entries			
274	Karen Jordan AT&T Phone Records			

Defendants' Joint Exhibit #	Description of Exhibit	Date Offered	Marked	Admitted
275	Email from Andrew Laska to Laura Maczka 2/18/2012			
276	Email from Greg Sowell to Laura Maczka 8/12/13			
277	Email from Greg Sowell to Laura Maczka 8/21/13			
278	Email from Chip Pratt to Laura Maczka 10/15/13			
279	Email from Chip Pratt to Laura Maczka 10/15/13			
280	Email from Chip Pratt to Laura Maczka 10/24/13			
281	Email from Chip Pratt to Laura Maczka 10/24/13			
282	Email from Mark Jordan to Laura Maczka 10/24/13			
283	Email from Julie Andrews to Laura Maczka 10/25/13			
284	Email from Chip Pratt to Laura Maczka 10/28/13			
285	Email from Rachel Chumney to Laura Maczka 10/28/13			
286	Email from Chip Pratt to Laura Maczka 10/29/13			
287	Email from Don Bouvier to Jeremy Thomason and Laura Maczka 10/29/13			
288	Email from Jay Dalehite to Laura Maczka 10/29/13			
289	Email from Mark Jordan to Laura Maczka 10/29/13			
290	Email from Rachel Chumney to Laura Maczka 10/29/13			
291	Email from Rachel Chumney to Laura Maczka 10/29/13			
292	Email from Chip Pratt to Laura Maczka 11/1/13			

Defendants' Joint Exhibit #	Description of Exhibit	Date Offered	Marked	Admitted
293	Email from Chip Pratt to Laura Maczka 11/1/13			
295	Email from Mark Jordan to Laura Maczka 11/1/13			
296	Email from Thomas Reid to Laura Maczka 11/4/13			
297	Email from Taylor Paton to Laura Maczka 11/5/13			
298	Email from Scott Dunn to Laura Maczka 11/10/13			
299	Email from Cyndy Silverthorn to Laura Maczka 11/11/13			
300	Email from Liz D'Amelio to Laura Maczka 11/11/13			
301	Email from Chip Pratt to Laura Maczka 11/19/13			

Respectfully submitted,

/s/ Jeff Kearney

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CERTIFICATE OF SERVICE

I hereby certify on July 1, 2021 a true and correct copy of the foregoing Notice of Intent to Offer Certified Records was delivered to the Assistant United States Attorneys Glenn Roque-Jackson and Heather Rattan, via the Court's Electronic Case File system.

/s/ JEFF KEARNEY

JEFF KEARNEY